

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

RHODE ISLAND COALITION AGAINST
DOMESTIC VIOLENCE *et al*,

Plaintiffs,

v.

PAMELA BONDI, *et al*,¹

Defendants.

Case No. 1:25-cv-00279

**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION AND FOR RELIEF
UNDER 5 U.S.C. § 705**

For the reasons provided in the attached memorandum, Plaintiffs hereby move for a preliminary injunction under Federal Rule of Civil Procedure 65 and for relief under 5 U.S.C. § 705.

For the reasons described in Plaintiffs' accompanying memorandum of law, declarations, exhibits, and original Complaint, Plaintiffs request that this Court enter relief under 5 U.S.C. § 705 staying the "Out-of-Scope" Funding Conditions and General Anti-DEI Certification Requirement (collectively, Funding Conditions), as defined in Plaintiffs' accompanying Memorandum in Support of Plaintiffs' Motion for Preliminary Injunction and for Relief Under 5 U.S.C. § 705, during the pendency of this action. Plaintiffs also request that the Court issue the following preliminary relief:

1. For any pending or future applications, preliminarily enjoin Defendants from applying the "Out-of-Scope" Funding Conditions, from requiring applicants or

¹ Plaintiffs' Complaint listed Defendant Ginger Baran Lyons as Acting Director of the Office on Violence Against Women. Her title should have been listed as "Supervisory Official for the Office on Violence Against Women and Deputy Director for Grants Development and Management."

awardees to certify upon submitting an application or accepting an award that they will comply with those conditions, and from requiring awardees to agree to the General Anti-DEI Certification;

2. For applicants who already submitted an application with a certification, preliminarily enjoin Defendants from treating that certification as effective and require them, in making any award, to clarify that the previously made certification is null and void and that the Funding Conditions do not apply; and
3. For applicants who already submitted an application without a compliant certification, preliminarily enjoin Defendants from disqualifying the applicant from consideration or otherwise disadvantaging the applicant based on the applicant's failure to submit a compliant certification pursuant to the Funding Conditions.

Plaintiffs also respectfully request expedited consideration and a hearing. Pursuant to a stipulation between Plaintiffs and Defendants, Plaintiffs and their members may temporarily apply for grants without certifying to the unlawful Funding Conditions. That agreement will expire on August 12, 2025.

June 26, 2025

Respectfully submitted,

/s/ Kyla M. Snow

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I filed the within document, the attached memorandum in support, and all attached supporting exhibits and documents, via the ECF system on the 26th day of June, 2025, that these documents are available for viewing and downloading to all counsel of record, and that I provided the same documents by email to: Kevin Hubbard, Civil Division Chief, United States Attorney's Office for the District of Rhode Island, Kevin.Hubbard@usdoj.gov.

/s/ Kyla M. Snow
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